

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In re:	
JOINT APPLICATION BY BELL SOUTH CORPORATION, BELL SOUTH TELECOMMUNICATIONS, INC., AND BELL SOUTH LONG DISTANCE, INC. FOR PROVISION OF IN-REGION, INTERLATA SERVICES IN GEORGIA AND LOUISIANA.	CC Docket No. 02-35

AFFIDAVIT OF DEBRA GOODLY

I, **DEBRA GOODLY**, being duly sworn upon oath, do hereby depose and state as follows:

1. My name is Debra Goodly. I am employed by Xspedius Corp. ("Xspedius") as Director of Provisioning. In that capacity, I direct and oversee the groups within Xspedius that process all outgoing customer service orders with BellSouth's Local Carrier Service Center ("LCSC"), and that process orders for long term number portability ("LNP") required when a customer converts from BellSouth facilities to Xspedius facilities. I interact with the BellSouth LCSC on a daily basis. My business address is 901 Lakeshore Drive, Lake Charles, Louisiana 70601. I have personal knowledge of the matters set forth in this Affidavit. The service problems described in this affidavit relate to events occurring after April 14, 2000 through the present time.

2. I am submitting this affidavit for use in support of Xspedius' opposition comments in Federal Communications Commission, Common Carrier Docket No. 02-35, and for any other lawful purpose.

3. Despite ongoing efforts working with our BellSouth Account Team, Xpedius continues to experience premature disconnects of customers in Louisiana. This results in the customer losing service prior to being converted to Xspedius. This problem occurs when

BellSouth processes customer disconnect orders before the customers' numbers are ported to Xspedius' switches. This problem also occurs when disconnect orders are worked by BellSouth despite Xspedius notifying BellSouth of a change in the due date for a customer conversion

4. Making the experience of losing telephone service worse, when the customer contacts the BellSouth customer service center to complain about loss of service, the BellSouth customer service representative advises the customer that Xspedius is responsible for the disconnect order and refuses to accept a trouble ticket from the customer. When this happens, Xspedius must intervene by contacting BellSouth's customer service center because BellSouth's LCSC cannot contact the customer once the disconnect order has been processed by BellSouth. In the majority of these instances, Xspedius must then contact the BellSouth repair center and request that BellSouth again check the date that the customer was due to be converted to Xspedius. Only at this time will BellSouth accept a trouble ticket from the customer.

5. BellSouth also refuses to allow a three-way telephone conference between BellSouth, Xspedius and the customer to assist in resolving an outage more quickly. Besides creating more delay, this refusal to allow a three-way telephone conference leaves the erroneous impression with the customer that the premature disconnect was caused by the fault of Xspedius.

6. I have requested that BellSouth appoint someone to contact the customer and advise the customer why his or her service was disconnected from BellSouth prior to being installed with Xspedius. This is important because in some instances, Xspedius has lost customers due to the premature disconnection of his or service due to no fault of Xspedius.

7. It has been my experience that these premature disconnections of customers have occurred frequently and repeatedly since April 14, 2000 through the present time. It is also

my impression that there is a lack of urgency on the part of BellSouth to have these customers' service reconnected once their service is lost due to the frequency of these incidents.

8. Xspedius has begun using BellSouth's Local Exchange Navigation System ("LENS") interface to place its resale and unbundled network element platform ("UNE-P") orders. Xspedius uses BellSouth's TAG interface to electronically submit orders.

9. Xspedius is also experiencing recurring problems having customer numbers being ported on the scheduled date due to BellSouth's failure to concur (i.e., release the numbers to Xspedius) in the scheduled port date in the Number Portability Administration Center ("NPAC") database prior to the scheduled date of the port. When BellSouth has not concurred in the porting of the customer's numbers, on the date of the scheduled number porting, the customer may be unable to receive incoming calls. This results in Xspedius having to reschedule the conversion date with the customer, or calling the BellSouth LCSC and waiting for BellSouth to manually concur in the number porting at that time. Of course, this results in customer inconvenience and frustration.

10. Xspedius has raised this issue with its BellSouth account team representatives in order to find a solution to the problem. BellSouth has responded that these problems recur because of a lack of training of its representatives.

11. Xspedius continues to experience instances where coordinated customer conversions are not performed as scheduled. Once Xspedius submits a local service request ("LSR"), BellSouth will respond with a firm order confirmation ("FOC") date. However, the scheduled conversion date is frequently missed because BellSouth fails to input or load the FOC date in its "C-Win Center." Thus, BellSouth's technicians are not aware that a customer conversion has been scheduled to be worked on a certain FOC date. This results in Xspedius not being able to port the customer's number on the FOC date. When this happens,

BellSouth is not willing to re-schedule the conversion, but instead requires that a new FOC date be established, which results in unnecessary delay for the customer.

12. Another example of unnecessary delay that Xspedius continues to experience is BellSouth's practice of repeatedly clarifying the same order. BellSouth may reject a customer conversion order for one reason and then when Xspedius makes the correction and sends the order back to BellSouth, BellSouth rejects it for another reason, rather than noting all errors at once. This requires Xspedius to continually re-submit the same order. Each correction delays the customer conversion another 48 hours. Additionally, Xspedius is required to pay a charge to BellSouth on each version of the order that has been clarified. Regardless of the reasons for the clarifications, an accurate one-time clarification would shorten customer conversion times.

13. Xspedius also experiences recurring problems with service order accuracy where Xspedius submits service orders which are not completed accurately by BellSouth. One particular example of this problem is when Xspedius submits an order to install a certain number of customer loops, and BellSouth installs less than the number correctly set forth on the order. When the conversion order is initially submitted by Xspedius, BellSouth will respond with a firm order confirmation to Xspedius that it will install all loops requested. However, on the installation date, BellSouth will then advise Xspedius that it will install some lesser number of loops because the service order data at BellSouth's C-WINS center shows some lesser number of loops than requested by Xspedius, and as earlier confirmed by BellSouth. When this happens, BellSouth delays the customer installation instead of installing on the firm order confirmation date. This results in customer frustration.

14. Access to due dates is also a problem. BellSouth will not provide Xspedius exact times of delivery of loops, including T-1's. Xspedius also requests and schedules

coordinated hot cuts with BellSouth. However, when the conversion time arrives, BellSouth may not be ready to perform the conversion despite prior confirmation with Xspedius.

15. Another recurring problem is the accuracy of BellSouth's customer service records. For example, in many instances CSRs will indicate that some customers have local service provider freezes in place preventing the conversion of these customers' accounts. Frequently, these customers will advise Xspedius that they never authorized a local service provider freeze being placed on their accounts. Having the CSR corrected adds unnecessary delay to the conversion process. Another example of inaccurate CSRs is the inclusion of an xDSL service code. Because BellSouth refuses to provide its xDSL service to end users taking voice service from a CLEC, until this service code is removed from the CSR, BellSouth will not convert the customer account to Xspedius. I have experienced many instances where the xDSL service code is included on customers' CSRs when in fact these customers were not xDSL customers of BellSouth. Having this service code removed from inaccurate CSRs adds an extra 15 – 20 days to the conversion interval, which delays the installation of Xspedius service. Correction of these inaccurate CSRs also requires that these customers contact BellSouth, which provides BellSouth another sales opportunity to entice these customers from switching to Xspedius.

16. Xspedius has also experienced problems ordering the UNE-Platform from BellSouth. An example of a recurring problem with UNE-P orders is BellSouth processing conversions prior to the scheduled due date requested by Xspedius.

17. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing information is true and correct.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on March 1, 2002.

/s/ Debra Goodly
Debra Goodly
Xspedius Corp.

STATE OF LOUISIANA)
)
PARISH OF CALCASIEU)

Subscribed and sworn to before me this 1st day of March, 2002.

Witness my hand and official seal.

My Commission expires: at death

/s/ Brenda L. LaComb
Notary Public